



IN THE CIRCUIT COURT FOR GENEVA COUNTY, ALABAMA

CRIMSON CATTLE COMPANY, L.L.C.,	)	
	)	
Plaintiff,	)	
	)	Case Number: CV-2021-
vs.	)	
	)	
AMENTUM SERVICES, INC.; and Fictitious	)	
Defendants "A", "B", "C", "D", "E", and "F",	)	
whether singular or plural, are those other	)	
persons, corporations, firms or other	)	
entities whose wrongful conduct caused	)	
or contributed to cause the injuries and	)	
damages to Plaintiff, all of whose true	)	
and correct names are unknown to	)	
Plaintiff at this time, but will be	)	
substituted by amendment when	)	
ascertained,	)	
	)	
Defendants.	)	

**COMPLAINT**

**Statement of the Parties**

1. Plaintiff Crimson Cattle Company, L.L.C. is a domestic corporation doing business in Geneva County, Alabama
2. Defendant Amentum Services, Inc., is a foreign corporation doing business in Geneva County, Alabama with its principal office located in Germantown, Maryland.
3. Fictitious Defendants "A", "B", "C", "D", "E" and "F" whether singular or plural, are those other persons, firms, corporations, or other entities whose wrongful conduct caused or contributed to cause the injuries and damages to Plaintiff, all of whose true and correct names are unknown to Plaintiff at this time, but will be substituted by amendment when ascertained.

**VENUE**

4. Venue is proper in Geneva County, Alabama in that Geneva County, Alabama is where all of the acts and/or omissions giving rise to Plaintiff's Complaint occurred.

**Statement of the Facts****COUNT ONE**

*(Negligence or Wantonness)*

5. On or about the nights of October 16, 2020, January 14, 2021 and June 26, 2021, in Geneva County, Alabama, Plaintiff witnessed employees of Defendant Amentum negligently or wantonly flying extremely low over Plaintiff's property buzzing, spot lighting "shining" and harassing Plaintiff's cattle, causing said cattle to run through Plaintiff's fencing causing damage to said fencing and injury and damages to Plaintiff's cattle. The Stated differently, as a direct and proximate consequence of Defendant Amentum's negligence or wantonness by flying extremely low over Plaintiff's property and cattle at night and spot lighting or "shining" and harassing said cattle, Defendant Amentum caused Plaintiff to suffer damage to its fencing, among other things, and injuries and damages to its cattle, which continues.

WHEREFORE, Plaintiff demands compensatory and punitive damages from Defendant Grindle in such an amount as a jury deems reasonable and may award, plus costs.

**JURY DEMAND**

**PLAINTIFF HEREBY DEMANDS TRIAL BY JURY  
ON ALL ISSUES OF THIS CAUSE.**

/s/Christopher E. Sanspree

CHRISTOPHER E. SANSPREE (SAN048)

One of the Attorney for Plaintiff

603 Martha Street

Montgomery, Alabama 36104

(334) 262-1001

(334) 262-1002 facsimile

[chris.sanspree@sanspreelaw.com](mailto:chris.sanspree@sanspreelaw.com)